

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

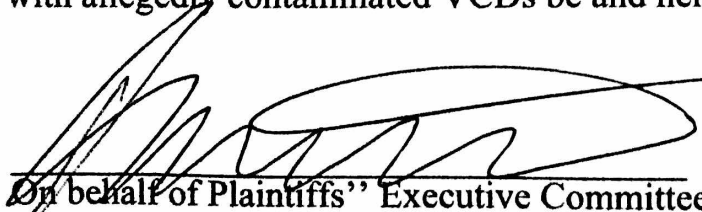
In re: Valsartan Products Liability Litigation : MDL No. 2875  
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: No. 1:19-cv-16209-RBK-JS

**NOTICE OF VOLUNTARY DISMISSAL WITHOUT PREJUDICE AS TO  
DEFENDANT, NOLA DISCOUNT PHARMACY**

**WHEREAS** the Court entered Case Management Order No. 15, which provides a mechanism for certain defendants to obtain a without prejudice dismissal from all cases pending in this MDL alleging claims in connection with allegedly contaminated valsartan-containing drugs ("VCDs");

**WHEREAS** Defendant, NOLA Discount Pharmacy, having provided the information and documents required by Case Management Order No. 15, and having agreed to the tolling provisions therein;

**IT IS HEREBY STIPULATED AND AGREED** between Plaintiffs Executive Committee and Defendant, NOLA Discount Pharmacy, that all cases pending and all future cases to be filed in this MDL alleging claims against NOLA Discount Pharmacy in connection with allegedly contaminated VCDs be and hereby are dismissed without prejudice.

  
On behalf of Plaintiffs' Executive Committee

David J. Stanoch, Esq.

Dated: 8/3/20



On behalf of Defendant, NOLA Discount Pharmacy

Rachel C. Bekerman, Esq.

Dated: 6/5/20

**CERTIFICATE OF SERVICE**

I hereby certify that on August 3, 2020, a true and correct copy of the foregoing was filed and served upon all counsel via operation of the CM/ECF system for the United States District Court for the District of New Jersey.

/s/ David J. Stanoch

David J. Stanoch